

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>IN RE:</b>	§	<b>CASE NO. 21-51513-mmp</b>
	§	
<b>POLICY SERVICES, INC.</b>	§	<b>Chapter 7</b>
	§	
<b>IN RE:</b>	§	
	§	<b>CASE NO. 21-51514-mmp</b>
<b>WIZARD MODE MEDIA, LLC,</b>	§	
	§	<b>Chapter 7</b>
<b>IN RE:</b>	§	
	§	<b>CASE NO. 21-51515-mmp</b>
<b>DEEPROOT PINBALL LLC,</b>	§	
	§	<b>Chapter 7</b>
<b>IN RE:</b>	§	
	§	<b>CASE NO. 21-51516-mmp</b>
<b>DEEPROOT GROWTH RUNS DEEP FUND, LLC,</b>	§	
	§	<b>Chapter 7</b>
<b>IN RE:</b>	§	
	§	<b>CASE NO. 21-51517-mmp</b>
<b>DEEPROOT 575 FUND, LLC,</b>	§	
	§	<b>Chapter 7</b>
<b>IN RE:</b>	§	
	§	<b>CASE NO. 21-51518-mmp</b>
<b>DEEPROOT 3 YEAR BONUS INCOME DEBENTURE FUND, LLC,</b>	§	
	§	<b>Chapter 7</b>
<b>IN RE:</b>	§	
	§	<b>CASE NO. 21-51519-mmp</b>
<b>DEEPROOT BONUSGROWTH 5 YEAR DEBENTURE FUND, LLC,</b>	§	
	§	<b>Chapter 7</b>
<b>IN RE:</b>	§	
	§	<b>CASE NO. 21-51520-mmp</b>
<b>DEEPROOT TECH LLC,</b>	§	
	§	<b>Chapter 7</b>
<b>IN RE:</b>	§	
	§	<b>CASE NO. 21-51521-mmp</b>
<b>DEEPROOT FUNDS LLC,</b>	§	
	§	<b>Chapter 7</b>

<b>IN RE:</b>	§	
	§	<b>CASE NO. 21-51522-mmp</b>
<b>DEEPROOT STUDIOS LLC,</b>	§	
	§	<b>Chapter 7</b>
<b>IN RE:</b>	§	
	§	<b>CASE NO. 21-51523-mmp</b>
<b>DEEPROOT CAPITAL MANAGEMENT, LLC,</b>	§	
	§	<b>Chapter 7</b>
<b>DEBTORS.</b>	§	

**DEBTORS' REQUEST FOR EXPEDITED HEARING ON  
DEBTORS' MOTION FOR JOINT ADMINISTRATION**

*Relates to ECF No. 8*

Policy Services, Inc., Wizard Mode Media, LLC, deeproot Pinball LLC, deeproot Growth Runs Deep Fund, LLC, deeproot 575 Fund, LLC, deeproot 3 Year Bonus Income Debenture Fund, LLC, deeproot BonusGrowth 5 Year Debenture Fund, LLC, deeproot Tech LLC, deeproot Funds LLC, deeproot Studios LLC, and deeproot Capital Management, LLC (collectively, the “Debtors”) debtors in the above-captioned chapter 7 bankruptcy case (the “Case”) file this request (this “Request”) for an expedited hearing on the Debtor’s Expedited Motion for Joint Administration (ECF No. 8 , the “Motion”). In support thereof, the Debtors respectfully state as follows:

1. On December 13, 2021, the Debtors filed the Motion.
2. The Debtors request a hearing on the Motion on **December 20, 2021 at 11:00 a.m.** before the Honorable Michael M. Parker, U.S. Bankruptcy Judge for the Western District of Texas, Courtroom #3, 3rd Floor, 615 E. Houston Street, San Antonio, Texas 78205. Parties may also attend the hearing by phone at (650) 479-3207; Access Code 2305 728 3687.
3. The Debtors estimate that a hearing on the Motion will last approximately fifteen minutes, absent objection.
4. Undersigned counsel certifies that there is a true necessity for an expedited hearing and that neither the Debtors nor their counsel created the need for an emergency hearing by a lack

of diligence. Rather, an expedited hearing will be useful to maximize efficiency with the Court's time and minimize administrative costs.

5. If this Request is granted, the Debtors will promptly file a notice of the hearing, which will be served via e-mail and/or mail on the limited-service list maintained in this chapter 7 case. Any additional notice will be provided as the Court directs.

WHEREFORE, the Debtors respectfully request that the Court (i) enter an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein, and (ii) grant such other and further relief as may be just and proper.

/s/ Catherine A. Curtis

Jason M. Rudd, Tex. Bar No. 24028786  
Catherine A. Curtis, Tex. Bar No. 24095708  
**WICK PHILLIPS GOULD & MARTIN, LLP**  
3131 McKinney Avenue, Suite 500  
Dallas, Texas 75204  
Telephone: (214) 692-6200  
Facsimile: (214) 692-6255  
jason.rudd@wickphillips.com  
catherine.curtis@wickphillips.com

**COUNSEL FOR DEBTOR**

### **CERTIFICATE OF SERVICE**

I certify that on December 14, 2021, a true and correct copy of the forgoing was served on the parties listed below, via ECF and/or email service where available, and otherwise via First Class United States Postal service.

/s/ Catherine A. Curtis

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>IN RE:</b>	<b>§</b>	<b>CASE NO. 21-51513</b>
	<b>§</b>	
<b>POLICY SERVICES, INC.</b>	<b>§</b>	<b>Chapter 7</b>
	<b>§</b>	
<b>IN RE:</b>	<b>§</b>	
	<b>§</b>	<b>CASE NO. 21-51514</b>
<b>WIZARD MODE MEDIA, LLC,</b>	<b>§</b>	
	<b>§</b>	<b>Chapter 7</b>
<b>IN RE:</b>	<b>§</b>	
	<b>§</b>	<b>CASE NO. 21-51515</b>
<b>DEEPROOT PINBALL LLC,</b>	<b>§</b>	
	<b>§</b>	<b>Chapter 7</b>
<b>IN RE:</b>	<b>§</b>	
	<b>§</b>	<b>CASE NO. 21-51516</b>
<b>DEEPROOT GROWTH RUNS DEEP FUND, LLC,</b>	<b>§</b>	
	<b>§</b>	<b>Chapter 7</b>
<b>IN RE:</b>	<b>§</b>	
	<b>§</b>	<b>CASE NO. 21-51517</b>
<b>DEEPROOT 575 FUND, LLC,</b>	<b>§</b>	
	<b>§</b>	<b>Chapter 7</b>
<b>IN RE:</b>	<b>§</b>	
	<b>§</b>	<b>CASE NO. 21-51518</b>
<b>DEEPROOT 3 YEAR BONUS INCOME</b>	<b>§</b>	
<b>DEBENTURE FUND, LLC,</b>	<b>§</b>	<b>Chapter 7</b>
	<b>§</b>	

<b>IN RE:</b>	§	
	§	<b>CASE NO. 21-51519</b>
<b>DEEPROOT BONUSGROWTH 5 YEAR</b>	§	
<b>DEBENTURE FUND, LLC,</b>	§	<b>Chapter 7</b>
	§	
<b>IN RE:</b>	§	
	§	<b>CASE NO. 21-51520</b>
<b>DEEPROOT TECH LLC,</b>	§	
	§	<b>Chapter 7</b>
<b>IN RE:</b>	§	
	§	<b>CASE NO. 21-51521</b>
<b>DEEPROOT FUNDS LLC,</b>	§	
	§	<b>Chapter 7</b>
<b>DEBTORS.</b>	§	

**ORDER GRANTING DEBTORS' REQUEST FOR EXPEDITED HEARING**

CAME ON FOR CONSIDERATION the request (the “Request”)<sup>1</sup> for an expedited hearing on the Debtors’ Expedited Motion for Joint Administration (the “Motion”), filed by Policy Services, Inc., Wizard Mode Media, LLC, deeproot Pinball LLC, deeproot Growth Runs Deep Fund, LLC, deeproot 575 Fund, LLC, deeproot 3 Year Bonus Income Debenture Fund, LLC, deeproot BonusGrowth 5 Year Debenture Fund, LLC, deeproot Tech LLC, deeproot Funds LLC, deeproot Studios LLC, and deeproot Capital Management, LLC (collectively, the “Debtors”) debtors in the above-captioned chapter 7 bankruptcy case on December 13, 2021. The Court finds that the Request should be granted as set forth below.

It is therefore ORDERED that the Motion is scheduled for expedited hearing on the date and time listed above.

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<sup>1</sup> Capitalized terms not otherwise defined herein are used as defined in the Motion.

PREPARED AND SUBMITTED BY:

Jason M. Rudd, Tex. Bar No. 24028786  
Catherine A. Curtis, Tex. Bar No. 24095708  
**WICK PHILLIPS GOULD & MARTIN, LLP**  
3131 McKinney Avenue, Suite 500  
Dallas, Texas 75204  
Telephone: (214) 692-6200  
Facsimile: (214) 692-6255  
jason.rudd@wickphillips.com  
catherine.curtis@wickphillips.com

**COUNSEL FOR DEBTOR**

**Debtors**

Policy Services, Inc.  
deeproot Pinball, LLC  
deeproot Growth Runs Deep Fund, LLC  
deeproot 575 Fund, LLC  
deeproot 3 Year Bonus Income Fund, LLC  
deeproot BonusGrowth 5 Year Debenture Fund, LLC  
deeproot Tech, LLC  
deeproot Funds, LLC  
deeproot Studios, LLC  
deeproot Capital Management, LLC  
12621 Silicon Dr.  
San Antonio, TX 78249

Wizard Mode Media, LLC  
12227 S. Business Park Drive, Suite 130  
Draper, UT 84020

Internal Revenue Service  
Centralized Insolvency Operation  
Post Office Box 7346  
Philadelphia, PA 19101-7346

Securities and Exchange Commission  
David Woodcock, Regional Director  
Burnett Plaza  
801 Cherry St., Suite 1900, Unit 18  
Fort Worth, TX 76102

**Debtors' Counsel**

Wick Phillips Gould & Martin, LLP  
Attn: Catherine A. Curtis  
3131 McKinney Ave., Suite 500  
Dallas, TX 75204

**United States Trustee**

Office of the United States Trustee  
615 E. Houston Street, Suite 533  
San Antonio, TX 78205

**Chapter 7 Trustee**

Randolph Osherow  
342 W. Woodlawn, Suite 100  
San Antonio, TX 78212

**Chapter 7 Trustee**

John Patrick Lowe  
2402 East Main Street  
Uvalde, TX 78801

Securities and Exchange Commission  
Secretary of the Treasury  
100 F St NE  
Washington, DC 20549